

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

No. 21-CR-00303 MV

vs.

RYAN HARRIS,

Defendant.

AMENDED MOTION TO WITHDRAW AS COUNSEL

COMES NOW Jack Mkhitarian, attorney, and hereby moves the Court for its Order allowing him to withdraw as counsel for Defendant, Ryan Harris, and as grounds therefore states as follows:

1. On March 12, 2021 Defendant Ryan Harris was charged by indictment with 18 U.S.C. § 922(g)(1) and 924, Felon Knowingly Possessed a Firearm and ammunition. Trial is currently scheduled on December 13, 2021.
2. Ryan Harris has discharged undersigned counsel as his attorney in this matter. As a result, communication between Ryan Harris and his undersigned counsel has broken down to the point where the attorney/client relationship no longer exists. In this circumstance, preparation for trial is not possible and undersigned counsel moves the Court to allow him to withdraw as counsel for Ryan Harris and does not oppose a hearing regarding the Motion to Withdraw as Counsel.
3. Due to the nature of this motion, the position of Letitia Carroll Simms, Assistant United States Attorney, was not solicited.

WHEREFORE it is respectfully requested that the Court enter its Order allowing undersigned to withdraw as counsel for Defendant Ryan Harris for the reasons set forth above.

Respectfully submitted:

Electronically filed
Jack Mkhitarian
Attorney for Ryan Harris
1008 5th St. NW
Albuquerque, NM 87102
(505) 200-2982

I HEREBY CERTIFY that a copy of the foregoing was mailed/delivered to all counsel of record this 8th day of October 2021. Jack Mkhitarian